

December 22, 2021

Richard Mittasch  
Grand Island Resources LLC  
P.O. Box 3395  
4415 Caribou Rd  
Nederland, CO 80466

**RE: Cross Gold Mine, Permit No. M-1977-410, Response to Proposed Activities**

Mr. Mittasch:

On December 21, 2021, the Division of Reclamation, Mining and Safety (DRMS) received a letter from Grand Island Resources LLC (GIR) listing proposed activities at the Cross Gold Mine which are categorized into three priority levels. This request for activity approval is in conformance with the Cease-and-Desist Order issued by the Mined Land Reclamation Board (Board) during the enforcement hearing held on December 15, 2021.

DRMS has completed its review of your proposed activities and has the following comments:

- 1) DRMS approves all proposed activities listed under “Priority 1”.
- 2) While DRMS approves all Priority 1 activities, we would appreciate some clarification on the following Priority 1 activities:
  - a. Please provide additional information on the proposed activities related to ventilation (1.1.3 and 1.1.4). Will upgrading the ventilation system include any surface disturbances? Which mine openings will be used for ventilation?
  - b. Please provide additional information on the Ground Support Installation (1.1.5). Will these proposed activities occur completely underground?
  - c. Please provide additional information on the “75” Sediment Control Sump Rehabilitation (1.2.2). What is the purpose of the “75” designation? Is this the 75<sup>th</sup> sump located in the Caribou Mine?
  - d. Please describe where sediment removed from underground sumps is placed.
- 3) DRMS approves all proposed activities listed under “Priority 2”, except for the Cross Shaft and Old Access Road Surface Reclamation (2.1.1), for which, DRMS has the following comments:
  - a. Please provide additional information on this proposed activity. For example, where is this mine opening located? Is this the mine opening referred to in Amendment No. 2 (AM-2) as the “Cross Ventilation Shaft”? If so, in AM-2, GIR is proposing to continue using this opening as a vent



shaft during mining, and to reclaim it with a precast concrete panel closure. The current proposal to backfill this shaft seems to contradict the proposed plan in AM-2.

- b. Would all proposed surface disturbances occur within the current approved permit area?
  - c. This proposed activity was classified as “Priority 2 – Approval Requested by December 27, 2021”; does this mean GIR intends to perform the proposed earthwork activity in the coming weeks? Please explain why this activity is considered a high priority at this point in time.
- 4) DRMS has the following comments regarding the proposed activities listed under “Priority 3”:
- a. Please provide additional information on the Winze Hoist and Winze Sump Rehabilitation (3.1.2). Where are these features located in the Cross Mine? Please be more specific in describing the proposed activities and explain why these activities are considered a high priority at this point in time.
  - b. Please provide additional information on the Sublevel Sediment Sumps Rehabilitation and Development (3.1.3). Please be more specific in describing the proposed activities and explain why these activities are considered a high priority at this point in time.
  - c. Please provide additional information on the Sediment Control Pond Upgrades (3.2.1). Is this referring to sediment ponds 3A-3C at the Caribou Mine? Please describe the type of “minor modifications” anticipated. DRMS approved the rehabilitation of sediment ponds 3A-3C through Technical Revision No. 8 (TR-8) and needs to assess whether the proposed activities will require an additional revision submittal.
- 5) DRMS has the following comments regarding the proposed Hydrogeologic Study (4):
- a. Please provide the Scope of Work which details the anticipated activities for this study.

If you have any questions, you may contact me by telephone at 303-866-3567, ext. 8129, or by email at [amy.eschberger@state.co.us](mailto:amy.eschberger@state.co.us).

Sincerely,



Amy Eschberger  
Environmental Protection Specialist

Cc: Daniel Takami, Grand Island Resources LLC  
Daniel Pollock, Grand Island Resources LLC  
Michael Cunningham, DRMS